

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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FRED MOGUL,

Plaintiff,

-against-

NEW YORK PUBLIC RADIO, WNYC,  
and AUDREY COOPER,

Defendants.  
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**NOTICE OF MOTION TO  
REMAND TO SUPREME  
COURT OF THE STATE OF  
NEW YORK OR  
OPPORTUNITY TO AMEND  
AND THEN REMAND TO  
SUPREME COURT**

No. 21-cv-5882 (CM)  
[rel. 21-cv-4972 (CM)]

**PLEASE TAKE NOTICE** that upon the accompanying Memorandum of Law in Support of Plaintiff's Motion to Remand, dated July 31, 2021, the Declaration of Cynthia Rollings in Support of Plaintiff's Motion to Remand, dated July 31, 2021 and accompanying exhibits, and the papers and pleadings in this action, Plaintiff moves this Court pursuant to 28 U.S.C. §§ 1446 and 1447 to remand this action to the New York State Supreme Court, New York County, or in the alternative, for an opportunity to amend his Complaint pursuant to Fed. R. Civ. P. 15 (a), and then remand to the Supreme Court, together with such other and further relief as may be just and proper.

Dated: New York, New York  
July 31, 2021

Respectfully submitted,



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